

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

CITY OF EL CENIZO, et al.

*Plaintiffs,*

v.

STATE OF TEXAS, et al.

*Defendants.*

CIVIL ACTION NO.  
5:17-cv-404-OG  
[Consolidated/lead case]

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**DEFENDANTS' ADVISORY TO THE COURT**

In accordance with the Court's order dated January 5<sup>th</sup>, 2024 (ECF No. 331), Defendants the State of Texas, Greg Abbott, in his official capacity as Governor of Texas, Ken Paxton, in his official capacity as Attorney General of Texas, ("State Defendants") file this advisory.

After a thorough search, State Defendants are aware of only one enforcement action taken by the Office of the Attorney General against joint Defendants the City of San Antonio, Erik Walsh in his official capacity as City Manager of the City of San Antonio, and William McManus in his official capacity as Chief of the San Antonio Police Department. A copy of the settlement agreement entered is attached to this advisory as Exhibit A. Outside of that enforcement action, State Defendants are unaware of any further past or pending state action to enforce or treats to enforce the provisions of Texas Senate Bill No. 4, passed by the 85<sup>th</sup> legislature. Should State Defendants discover any additional evidence of enforcement or a treat of enforcement they will promptly notify this Court.

Date: January 29, 2024

Respectfully submitted.

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/s/HEATHER L. DYER  
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**COUNSEL FOR DEFENDANTS THE STATE  
OF TEXAS, GOVERNOR GREG ABBOTT, &  
ATTORNEY GENERAL KEN PAXTON**

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 29, 2024, and that all counsel of record were served by CM/ECF.

/s/Heather L. Dyer  
HEATHER L. DYER